

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GWENDOLYN EPHRAIM,)	
)	
Plaintiff,)	07 C 7164
)	
v.)	Judge Lefkow
)	
CITY OF CHICAGO, et. al.)	Magistrate Judge Denlow
)	
Defendants.)	

**OFFICER J. DURAN'S AND M. FREGOSO'S AGREED MOTION
FOR EXTENSION OF TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendants, Police Officer Juan Duran and Police Officer Maria Fregoso, (collectively, "Defendant Officers"), by their attorneys, Marc J. Boxerman and Schneur Z. Nathan, with the agreement of Plaintiff's attorney, respectfully request this Honorable Court for an extension of time until March 26, 2008, to answer or otherwise plead to Plaintiff's Complaint.

In support of this motion, Defendant Officers state:

1. Plaintiff filed her complaint on December 20, 2007.
2. Attorneys for the City of Chicago filed their appearance on January 29, 2007 and on that day filed a motion for extension of time to February 29, 2007 by which to answer or otherwise plead in response to Plaintiff's complaint. This Court granted that motion on February 5, 2008.
3. Officer Maria Fregoso was personally served with the complaint on January 18, 2008, and was thus due to answer the complaint by February 8, 2008. Officer Juan Duran was personally served with the complaint on January 19, 2008, and was thus due to answer by February 11, 2008. Their attorneys were assigned this

matter in mid-February and have not yet had an opportunity to meet with the officers so that they may answer the complaint on their behalf.

4. Mr. Boxerman is in the process of ordering the relevant Chicago Police Department records to enable the officers to properly respond to Plaintiff's complaint.
5. This motion is the Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of this matter, nor will it prejudice Plaintiff.
6. Mr. Boxerman spoke to Katie Z. Ehrmin, one of Plaintiff's attorneys, and informed her of his intention to file this motion. Ms. Ehrim indicated she had no objection.

WHEREFORE, Officers Juan Duran and Maria Fregoso respectfully request that they be given until March 26, 2008, to answer or otherwise plead to Plaintiffs' complaint.

Respectfully Submitted,

/s/ Marc J. Boxerman
MARC J. BOXERMAN
Senior Counsel
Attorney for the Defendant Officers

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CERTIFICATE OF SERVICE

I certify that on February 25, 2008, I caused true and correct copies of Officer J. Duran's and M. Fregoso's Agreed Motion for Extension of Time in which to Answer or Otherwise Plead and Notice of Motion to be served upon the persons named in the Notice of Motion, each a "Filing User" pursuant to ECF, in accordance with the rules of electronic filing of documents.

/s/ Marc J. Boxerman
MARC J. BOXERMAN